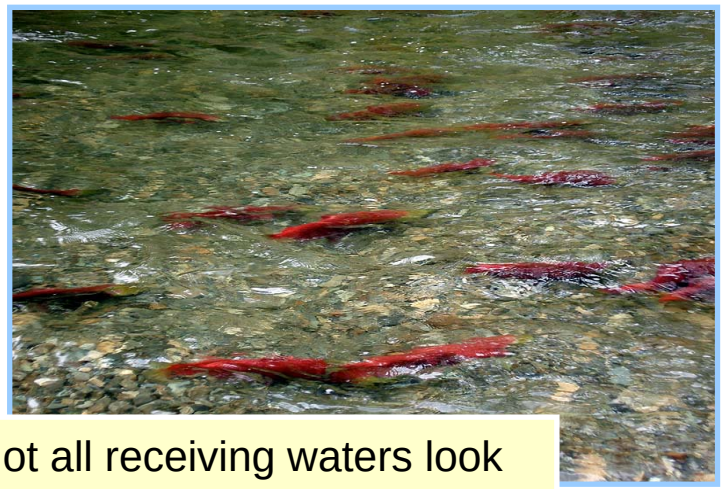
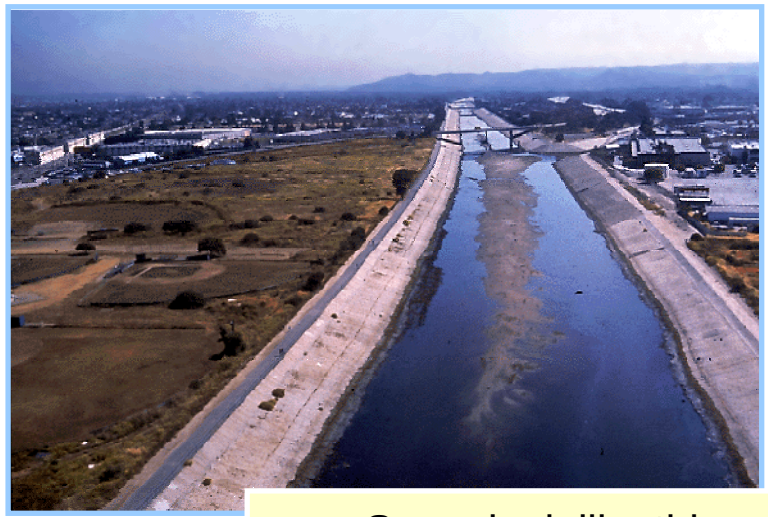
Receiving water condition is important



Not all receiving waters look like this…



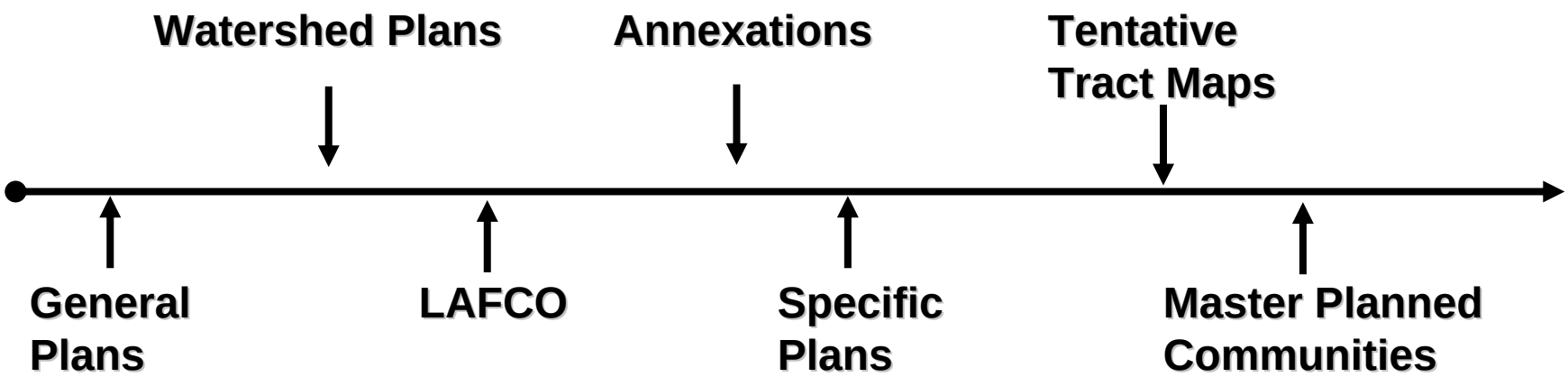
Some look like this…

Or this…with naturally high turbidity

Fixed, numeric metrics for site design features in MS4 Permits…..industry concerns:

- One-size fits all LID mandates
- Discounts feasibility determinations; eg. soil conditions, geotechnical constraints, sub-regional alternatives
- Establishes absolutes that don't reflect the reality of changes due to land use
- Use instead, the MS4 permit to establish levels of significance for CEQA process

LID Water Quality Metrics into MS4 Permits—Synchronizing and integrating with CEQA



Opportunities to Include LID Site Design Metrics into Projects

Why use the CEQA Process?

- **Apply LID metrics as early as possible in the land use planning and development design process**
- **LID metrics should not unduly complicate environmental review and project approvals—consider early and often**
- **LID metrics should not undermine vested project design approvals already settled pursuant to CEQA**

Office Building/Business Park Project

Project Area ≈ 10 acres
TIA ≈ 90%
EIA ≈ 4.5%

Disconnected impervious areas = areas treated in bioretention

Effective areas = areas treated in media filters and downstream hydrodynamic separator

Media filters required due to space/grade restrictions

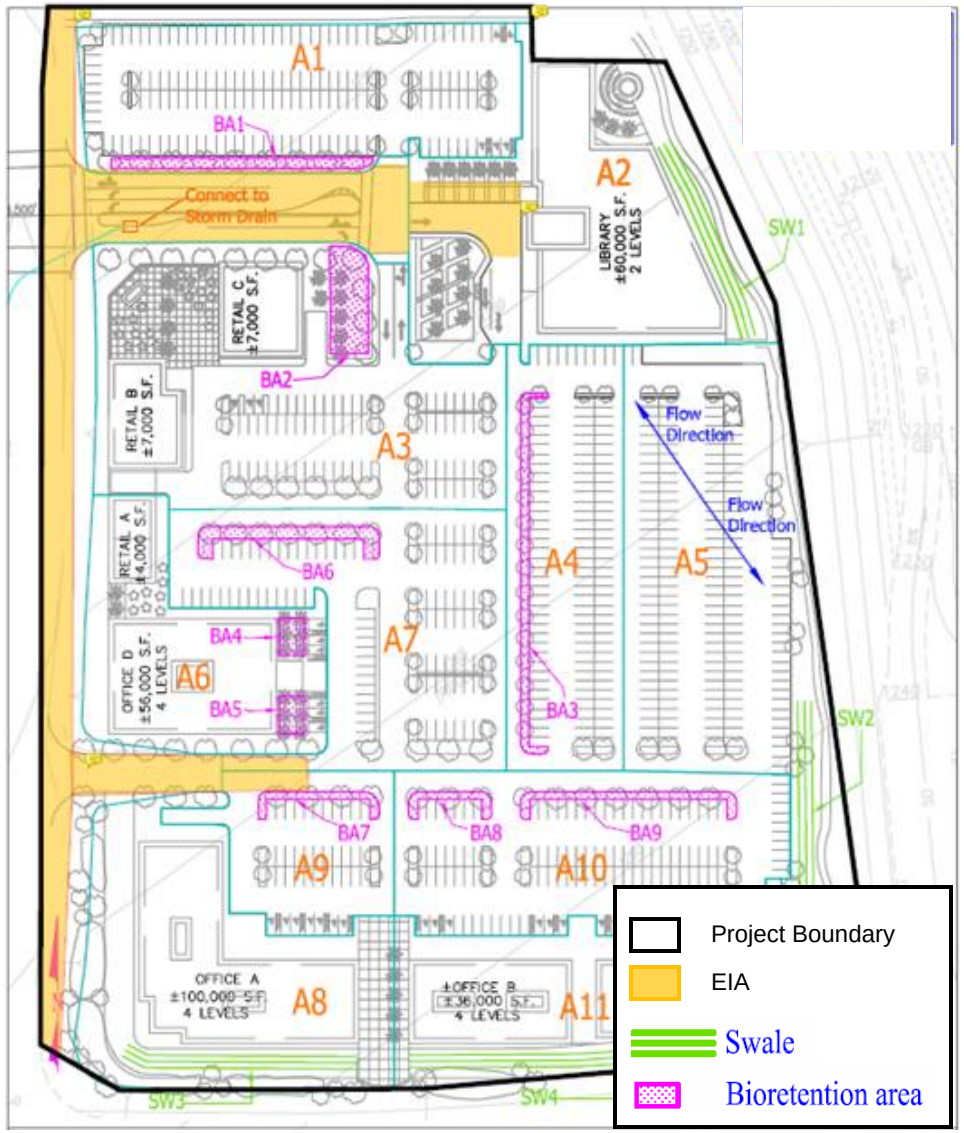
Off-street Commercial Project

Project Area ≈ 15 acres
TIA ≈ 90%
EIA ≈ 8%

Disconnected impervious areas = areas treated in bioretention and swales

Effective areas = areas treated in media filters

Media filters required due to space/grade restrictions



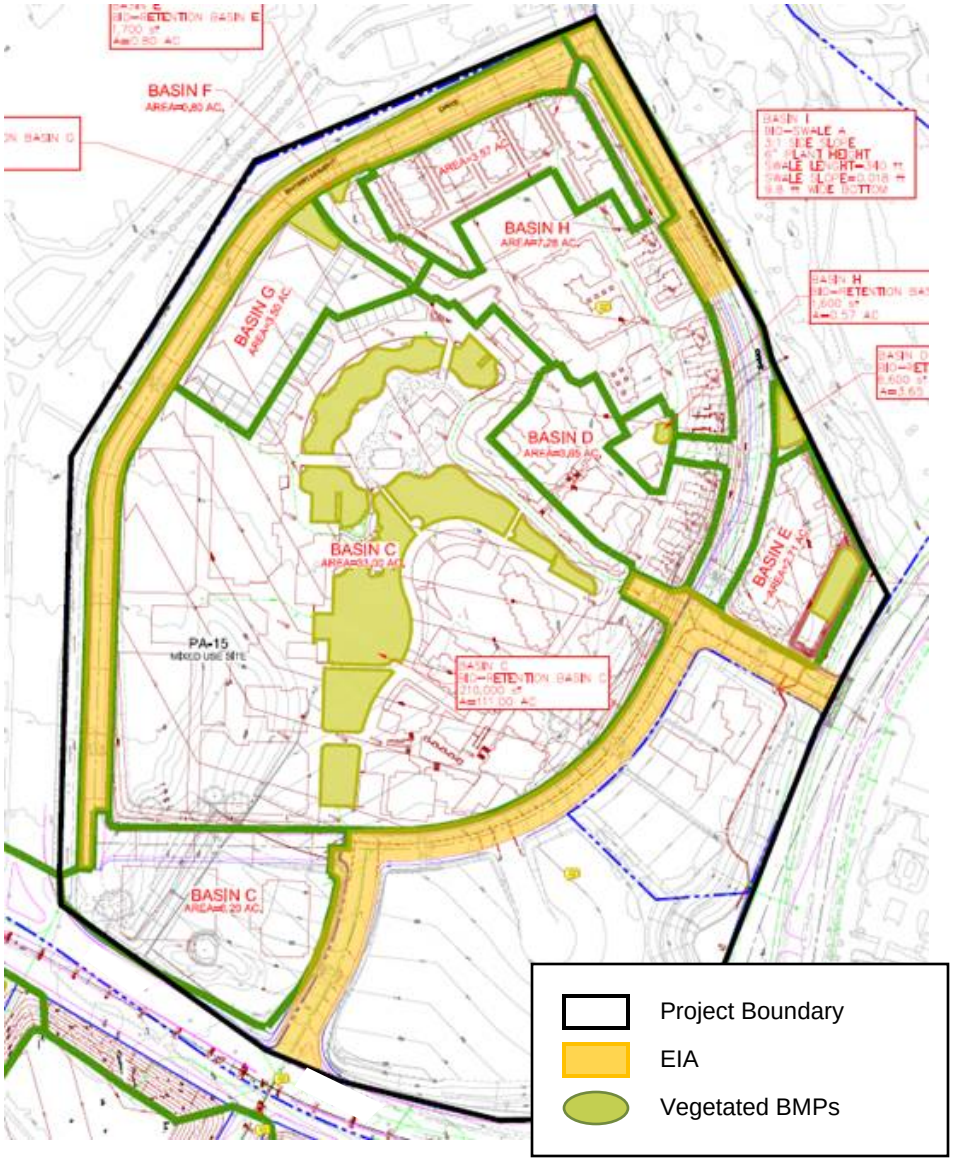
High Density Mixed Use Project

Project Area ≈ 50 acres
TIA ≈ 80%
EIA ≈ 11%

Disconnected impervious areas = areas treated in bioretention and retention lake

Effective areas = areas treated in media filters and downstream hydrodynamic separator

Media filters required due to space/grade restrictions



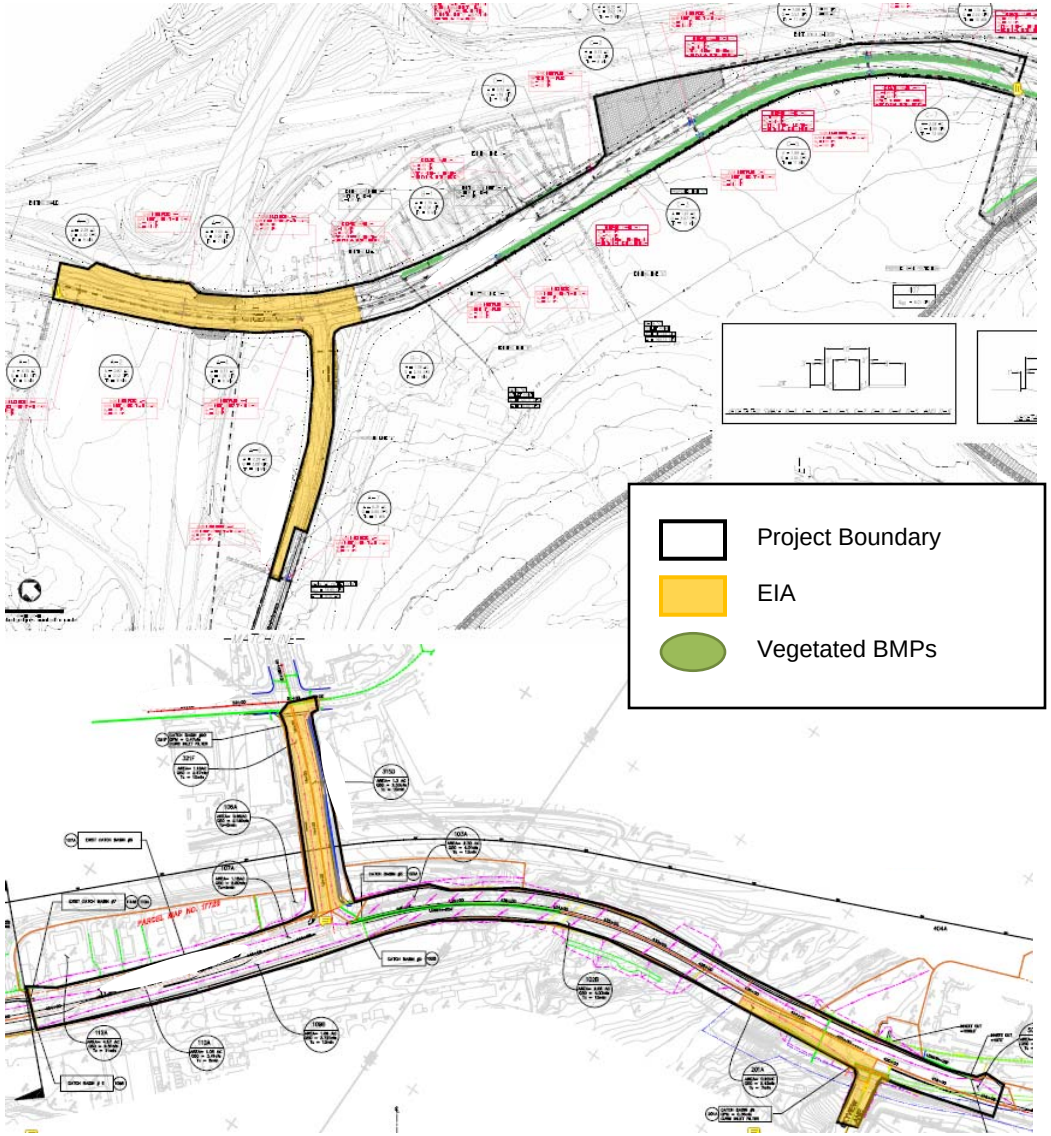
Roadway Improvement Project

Project Area ≈ 25 acres
TIA ≈ 90%
EIA ≈ 15%

Disconnected impervious areas = areas treated in vegetated swales and EDBs

Effective areas = areas treated in media filters

Media filters required due to space/grade restrictions



Summary

Land Use	Area, ac	Total Impervious Area, ac	%TIA	Effective Impervious Area, ac	*%EIA*
Office Building/Business Park	10	9.0	90%	0.45	***4.5%***
Off-street Commercial	15	13.5	90%	1.2	***8%***
High Density Mixed Use	50	40	80%	5.5	***11%***
Roadway Improvement	25	22.5	90%	3.8	***15%***